

DEPARTMENT OF HEALTH SERVICES  
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LOS ANGELES, CA 90012  
(213) 620-2380



INSPECTION REPORT  
on  
MacDermid, Inc.  
5439 San Fernando Road West  
Los Angeles, CA 90039  
(818) 240-9573

EPA ID # CAD 010707222

Inspected by : Carol Carollo

Report Prepared by : Javier Hinojosa

Date of Inspection : November 14, 1988

Date of Report : December 14, 1988

I. Purpose

To conduct a compliance evaluation inspection of a generator and a Treatment, Storage and Disposal Facility (TSD).

II. Representatives:

MacDermid, Inc.:

Bob Tice, Plant Manager

Beverly Easley, Office Supervisor

Department of Health Services/Toxic Substances Control Division  
(DHS/TSCD):

Carol Carollo - Associate Hazardous Materials Specialist

Javier Hinojosa - Hazardous Materials Specialist

III. Owner/Operator:

The MacDermid facility in Los Angeles is a regional office of the MacDermid Corporation, headquartered at 245 Freight Street, Waterbury Connecticut. The persons responsible for the management of hazardous waste generated at the facility are Robert Tice, Plant Manager and Beverly Easley, Office Supervisor.

IV. Background

- 1) October 15, 1975 - Facility began operating.
- 2) November 10, 1981 - DHS/TSCD issued facility an Interim Status Document (ISD).
- 3) January 14, 1986 & February 21, 1986- A generator and TSD inspection of the facility was conducted by DHS/TSCD inspector Ken Hughes. Fifteen Class I/II generator and TSD violations were found.
- 4) April 16, 1986 - DHS/TSCD issued facility a Notice of Violation (NOV) for violations discovered by Hughes inspection.
- 5) December 14, 1986 - Facility submitted a draft TSDF closure plan to DHS/TSCD. This plan was either lost or never received by DHS/TSCD.
- 6) April 10, 1987 - Facility submitted a second copy of the draft closure plan to DHS/TSCD.

- 7) June 11, 1987 - A generator and TSD inspection of the facility was conducted by DHS/TSCD inspector Teena Mizunoe. The facility was found in violation of twelve Class II counts.
- 8) June 22, 1987 - A follow-up inspection of the facility was conducted by DHS/TSCD inspector Teena Mizunoe. Facility was found in compliance.
- 9) September 15, 1987 - DHS/TSCD -Financial Responsibility Unit issued facility an NOV for failing to provide liability coverage and financial assurance for closure cost.

V. General Description of Facility:

The MacDermid facility consists of administrative offices, a quality control laboratory, and a warehouse. (See attachment 1). The facility is presently considered a TSD and a generator. However, the facility has initiated closure procedures in order to become solely a generator.

VI. Hazardous Waste Activity Description:

MacDermid currently generates primarily two waste streams, laboratory waste and floor waste. The lab wastes consist of samples that MacDermid's clients send in for testing such as nickel, tin/lead, chromic acid, electroless copper and cyanide plating solutions; and acid zinc chloride solution and palladium chloride activator solutions. These wastes are generated after the clients' samples have been analyzed and the samples are no longer needed. The floor waste is generated from MacDermid's currently on-going clean-up project. It is currently conducting a thorough clean-up of the facility's warehouse area. This waste stream is made up of copper, nickel, and lead solution.

Prior to 1986, MacDermid received manifested recyclable materials from its customers. These wastes were taken to either Sunland Chemical or other recyclers (such as CP Chemical) after receipt at MacDermid's facility. MacDermid claims that it has not stored hazardous waste for greater than 90 days, nor did it treat or dispose of the recyclable materials on-site. MacDermid also claims in its closure plan that the recyclable materials were never stored on-site, but were "...immediately transferred to storage and/or processing equipment on Sunland's property".

## VII. Potential Violations:

COUNT 1: Title 22, California Code of Regulations (Cal. Code Regs.), section 66471. Hazardous Waste Determination Requirement for the Generator.

Two-five gallon containers with dark residues were found in the hazardous waste storage area behind 55-gallon drums of fluoroboric acid (see attachment 3; photo # 1). In addition, a five gallon container with several three-quarter liter bottles containing unidentified residues was found near the fire storage cabinets (see attachment 3, photo # 2).

COUNT 2: Title 22, Cal. Code Regs., section 66508 (a) (2). Accumulation Time for the Generator.

Two 55-gallon drums of fluoroboric acid waste and one drum of cyanide waste were not marked with accumulation start dates.

COUNT 3: Title 22, Cal. Code Regs., section 67105 (d) (1). Personnel Training.

Facility did not have recorded the names of each person filling each position related to the management of hazardous waste.

COUNT 4: Title 22, Cal. Code Regs., section 67141 (c) and (f). Content of Contingency Plan.

Contingency Plan did not describe arrangements agreed to by local authorities to coordinate emergency services pursuant to section 67126 nor did it contain an adequate evacuation plan.

COUNT 5: Title 22, Cal. Code Regs., section 67124. Required aisle space.

Facility did not maintain sufficient aisle space to allow unobstructed movement between hazardous materials and hazardous waste (see attachment 3, photo # 2).

## VIII. OBSERVATIONS:

On November 14, 1988, at approximately 1330 hours, DHS inspector Carol Carollo and I arrived at the MacDermid facility. We met with Bob Tice, the Plant Manager.

We began the inspection by discussing the facility's operations, what waste streams it generates and how it managed those waste streams. Details are listed in Section IV. Tice stated that the facility was currently undergoing some renovations which included the painting of the office areas and a thorough floor cleaning of the warehouse area.

We proceeded with the review of the facility's records. In our review the following records were found in the conditions indicated as below:

- a) Manifests - Manifests for 1986, 1987, and 1988 were reviewed and found to be properly completed with the exception of a single manifest. Uniform Hazardous Waste Manifest (UHM) # 874560674 had a discrepancy in the designated TSD EPA ID number that was caught by the designated TSD. Land Disposal Restriction (LDR) notifications were found to be attached with some of the manifests.
- b) Inspection Logs - Facility was found to keep an adequate inspection log of the hazardous lab waste storage area.
- c) Training Records - Facility could not provide for review the necessary records. Tice states that he was unfamiliar with the availability of the records, since he was recently appointed to this facility. I told Tice to produce a copy that if the records became available and forward it to DHS/TSCD. On November 16, 1988, the DHS/TSCD received a copy of these records. These records did not include all the necessary information. (See attachment 4).
- d) Contingency Plan - Plan did not include an adequate evacuation plan.
- e) Biennial Reports - Biennial Reports from 1985 and 1987 appeared to be adequate.
- f) Financial Assurance (FA) - Documentation provided appeared to be adequate.
- g) Closure Plan (CP) - A draft of the CP was later reviewed in the office and found to appear adequate.

We proceeded on a walk through of the facility with Tice. In the hazardous waste storage area, I observed approximately ten drums. I noticed that there were two partially filled 55 gallon drums labelled as fluoroboric acid that were not marked with accumulation start dates. As we inspected this area, Carollo discovered two five-gallon containers containing dark residues which Tice was unable to identify. The containers were stored in the back of the storage area, behind the fluoroboric acid drums (see attachment 3, photo # 1). In addition, I observed inadequate aisle space in the hazardous lab waste storage area. (See attachment 3, photo # 1).

A few feet away from the hazardous waste storage area, by the fire storage cabinet, I observed a five gallon container with some trash and several three-quarter liter containers with dark residue sediments (see attachment 3, photo # 2). Upon questioning Tice as to the contents of this container, he stated that this container was not a trash can and that employees must have mistaken it for one. Tice stated that the three-quarter liter containers were temporarily placed there before being triple rinsed and then disposed of properly.

As we continued our walk-through of the facility, we noted no other deficiencies.


IX. Discussion With Management

In concluding the inspection, I discussed with Tice the violations noted in Section IV. I told him to forward to me all records that were unavailable for review during the inspection, and that I would be sending him a Report of Violations for all deficiencies found.

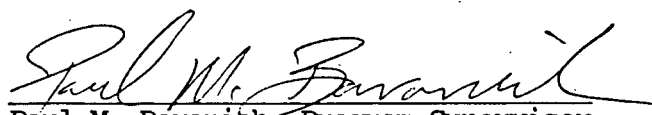
X. Attachments

1. Map of Facility - one page.
2. Surveillance and Compliance Report dated 11-14-88 - one page.
3. Photographs from November 14, 1988 Inspection - one page.
4. Training Program - eleven pages.
5. Checklist - pages.

X. SIGNATURES:

  
Javier Hinojosa  
Hazardous Materials Specialist

12/14/88  
Date

  
Paul M. Baranish, Program Supervisor  
Surveillance & Enforcement Unit  
Region 3 (Los Angeles)  
Toxic Substances Control Division

12/14/88  
Date

## INSPECTION REPORT

MacDermid, Inc.  
5439 San Fernando Road West  
Los Angeles, CA 90039

RCRA Non-Major  
CAD010707222

Inspected By: Teena Mizunoue  
Date of Inspection: June 11, 1987  
Date of Report: July 10, 1987

### I. Purpose

The purpose of this inspection was to conduct the annual treatment, storage, and disposal (TSD) facility and generator inspections.

### II. Representatives Present

Cherrie D. Gillis, Compliance Administrator, MacDermid, Inc.  
Teena Mizunoue, Hazardous Materials Specialist, Dept. of Health Services (DHS)  
Robert M. Senga, Associate Hazardous Materials Specialist, DHS  
Rick Jones, Hazardous Materials Specialist, DHS

### III. Facility Description

The MacDermid facility consists of administrative offices, quality control laboratory, warehouse, and hazardous waste storage area. The facility is presently considered a TSD and generator. However, the facility is initiating closure procedures in order for it to become just a generator.

The MacDermid facility leases its space from the Sunland Corporation. MacDermid does not do any manufacturing nor does it treat, dispose, or store hazardous waste. MacDermid is mainly a warehouse of fresh chemicals for its customers. Most of its customers are those involved in the printed circuit board industry. Therefore, their stock consists of acids, alkalis, a few cyanides, and a few flammable materials too. The MacDermid facility also operates a service lab which analyzes its customers' samples. The samples are analyzed so that the customer can determine if they can still make use of a bath or chemical. The MacDermid warehouse also contains an underground clarifier. However, MacDermid does not own this clarifier. The clarifier is the property of the Sunland Corporation whom MacDermid leases the warehouse from.

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The last annual TSD inspection was conducted on February 21, 1986 by Ken Hughes of the DHS. From that inspection, fifteen (15) violations of the California Administrative Code (CAC) were found and a notice of violation (NOV) was issued. The facility responded with a compliance schedule ( Attachment 8 ) that outlined each violation, its course of remediation, and completion date. The company submitted their TSD closure plan on December 14, 1986. This initial closure plan was received by Ken Hughes of the DHS. According to Mr. Hughes, the first closure plan was misplaced and a second copy submitted to the Department on April 10, 1987. This second copy was forwarded to the permitting unit of the DHS for review and approval.

#### IV. Waste Streams and Waste Management

The only waste stream that MacDermid currently generates is laboratory wastes. These lab wastes consist of the samples that MacDermid's customers send to them for testing. The lab wastes are generated after the customers' samples have been analyzed and the sample is no longer needed. The facility stores the discarded samples in compatible 55 gallon drums for less than ninety (90) days. The drums are properly labelled including accumulation date and stored in a small storage area on top of wooden pallets in the northeast corner of the warehouse. The drums of lab waste are forwarded to Chemical Waste Management for metal recovery and disposal.

Prior to 1986, MacDermid received manifested recyclable materials from its customers. These wastes were taken to either Sunland Chemical or other recyclers (such as CP Chemical) after receipt of the waste. It appears as though MacDermid acted as a transfer station for these recyclable materials. MacDermid claims that it did not store for greater than 90 days, treat, or dispose of the recyclable materials on-site.

#### V. Inspection Observations

Both generator and TSD inspections were conducted with the completion of both types of checklists. A record review and facility walkthrough were done too.

##### A. Record Review

Numerous record/paperwork violations were found as the TSD and generator checklists were evaluated. These numerous violations were due to the fact that MacDermid presently has no one at the Los Angeles facility who exclusively handles the RCRA regulated aspects of the company. The RCRA aspects of the facility were previously handled by James Tunncliffe, who left the company about six months ago. According to Ms. Gillis, when Mr. Tunncliffe left no one was informed about or put in charge of the various RCRA related records.



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Therefore, most of the records were misplaced (when the office was cleared) and she was unable to locate them before this inspection was conducted.

The following records were not available for review: Inspection program and records, personnel training program and records, contingency plan, and annual and biennial reports. Ms. Gillis informed us that MacDermid has submitted a closure plan to the DHS in order to close down the TSD aspect of the facility. She also stated that the DHS has told MacDermid that they need not file a revised Part A application until their closure is acted upon. During the record review, manifests for the years 1985, 1986, and 1987 were looked at and were found to be in order.

#### B. Facility Walkthrough

Before conducting the walkthrough inspection, I (Teena Mizunoue) asked Cherrie Gillis if pictures could be taken inside the facility. Ms. Gillis spoke with the company Vice President of Sales who said no. We were first shown the administrative offices where the typical office equipment and business offices were located. We then walked into the quality control laboratory. This lab is shared by both MacDermid and the Sunland Corporation. The lab contained various analytical equipment and chemicals. After walking through the lab, we toured the warehouse area.

The warehouse consisted of six rows of five level high metal shelves with various chemicals on them. The area was well maintained and free of obstructions. Forklifts were easily maneuvered around the warehouse. On the western side of the warehouse was a loading dock area with roll down doors. Just north of the loading dock area were six (6) pallets of twelve (12) carboys each of chromic acid carboys. According to Ms. Gillis and a warehouseman, the carboys had been sitting at the facility for at least five (5) months. Ms. Gillis informed us that the chromic acid carboys are rinsed out by the customers before they are returned to MacDermid for deposit. However, this situation couldn't be detected by just looking at the dusty carboys. It was suggested that MacDermid's customers label the carboys with the statement that they are rinsed out and empty. Ms. Gillis stated that she would contact MacDermid headquarters to determine what could be done with the empty carboys.

Adjacent to the empty carboys were two-165 gallon containers of unused nickel solution. Ms. Gillis stated that the nickel solution didn't meet the specifications of a customer. Therefore, it was being kept there until another buyer could be found or the company made a decision on what to do with it.

We then proceeded to the northwest corner of the warehouse where the hazardous waste storage area was located. The storage area consisted of three-55 gallon drums which were atop wooden pallets. The drums were properly labelled with accumulation date and all other waste identification information. A single 55

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gallon drum of a labelled hazardous waste was located over ten (10) feet above the warehouse floor and near the edge of its shelf. I informed Ms. Gillis that all drums of hazardous waste must be maintained to prevent the possibility of the drum rupturing. I requested that the drum on the second shelf be brought down to the warehouse floor. Ms. Gillis stated that the drum would be lowered later today. Ms. Gillis also informed us that the drums of hazardous waste are not stored longer than ninety (90) days. This schedule is adhered to regardless of how full the drums are by the 90 day limit. The drummed wastes are picked up by Chemical Waste Management for metal recovery and disposal. Attached to the shelf in the hazardous waste storage area was a hazardous waste storage area inspection sheet/log. According to the log, the hazardous waste storage area is inspected weekly for leaks, drum condition, labels, etc.

Also located in the northeast corner of the warehouse were numerous shelves of customer samples. These samples were in plastic containers and were being kept until they became outdated (expired beyond shelf life) or they were no longer needed for quality control of the customer's chemicals/baths. Some of the bottles of samples were dented but not ruptured or leaking. Ms. Gillis stated that she planned to have any outdated samples or dented bottles discarded as hazardous waste as soon as possible.

In the floor adjacent to the sample and hazardous waste storage areas was an underground clarifier that belonged to the Sunland Chemical Company. The clarifier was operating and being monitored by a pH meter which was located above the clarifier plate covers.

The emergency eyewash and shower (located on the eastside of the warehouse and outside the quality control lab) weren't tested due to the mess it might cause on the warehouse floor and Ms. Gillis wasn't sure if they were connected to an alarm system. It was recommended that the safety equipment be checked at a later date to determine if it's operable.

The inspection tour was concluded and we proceeded back to the meeting room.

## VI. Violations

The following record violations were found:

1. Section 67104 California Administrative Code (CAC) - No copy of the inspection plan/schedule was available at the facility for review.
2. Section 67105 CAC - No copy of the personnel training program/records were available for review at the facility.
3. Sections 67140, 67141, 67142, 67143 CAC - No copy of the contingency plan was available for review at the facility.

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4. Section 67164 (a) CAC - No inspection, contingency, and training plans were available for review at the time of the inspection.
5. Section 67144 CAC - No emergency coordinator has been designated at the facility.
6. Section 67165 CAC - No copies of the annual report were available for review at the time of the inspection.
7. Section 67101 (b) CAC - No copy of the ISD was on file at the facility.
8. Section 66492 (b), 66493 - No copies of the biennial report were on file at the facility.

The following violation was found during the facility walkthrough tour:

1. Section 67243 (b) - A single 55 gallon drum of hazardous waste was located over ten (10) feet above the warehouse floor and near the edge of the shelf. The drum could possibly fall and rupture.

All of the above violations were summarized in the inspection compliance report that was written at the end of the inspection ( Attachment 5 ). A copy of the compliance report was given to Cherrie D. Gillis.

#### VII. Discussion with Management

All of the violations cited in Section VI were discussed with Ms. Gillis. She believed that the various records that weren't available for review here, did exist in her files at MacDermid's headquarters in Connecticut. Ms. Gillis stated that she would mail copies of the missing records to me and to the Los Angeles facility for on-site maintenance. Ms. Gillis felt that these records were at the facility, but she had no idea of their location. As mentioned before, the facility's RCRA program is in turmoil since the coordinator position is vacant due to the resignation of Mr. Tunnicliff.

I discussed with Ms. Gillis the need for designating an emergency coordinator. She said one would be designated and I would be notified as soon as possible. I stressed to Ms. Gillis that the single 55 gallon drum of hazardous waste located above the warehouse floor must be lowered to the warehouse floor in order to prevent it from rupturing. She said that she would have this done later today.

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As to the chromic acid carboys, Ms. Gillis stated that she would contact MacDermid headquarters about their removal. She also stated that she will be initiating the proper disposal of any expired or no longer needed customer samples. She also stated that she would check on the operating status of the emergency eyewash and shower through consultation with John Fowler of MacDermid. Ms. Gillis believed that Mr. Fowler might have already tested the emergency equipment the last time he was at the Los Angeles facility.

Ms. Gillis was handed the written compliance report to read, sign, and make a copy of.

We left the MacDermid facility at 1245 hours. Three pictures were taken of the outside of the facility ( Attachments 6 & 7 ) prior to our departure from the site.

#### VIII. Conclusions

From this inspection it was discovered that the MacDermid, Inc. facility (currently classified as a TSD and generator) was in the process of going through closure with respect to its TSD classification. They had originally submitted their closure plan to the DHS on December 14, 1986 and then resubmitted it on April 10, 1987 due to the plan being misplaced. At this time, the closure plan is still pending review by the DHS permitting unit.

Despite the initiation of closure procedures, the annual TSD and generator inspections were conducted. Ms. Gillis of MacDermid was informed that the facility was still considered a TSD and must still meet those requirements until they are made a generator only. Ms. Gillis was under the impression that MacDermid had to only meet generator requirements at this time. We instructed her that if they met the TSD requirements, then their transition to generator status would be easier. Ms. Gillis was also told that once MacDermid becomes a generator, it could request a variance to store its hazardous waste for greater than 90 days. This was suggested so MacDermid could prevent the disposal of less than full drums of hazardous waste.

The MacDermid facility had numerous record violations. This was due in part to the non-existence of an individual who handles the RCRA aspects of the facility. When the previous RCRA coordinator left, his office was cleared and some of the paperwork from there was misplaced. This facility has a real need for a person to take over the RCRA regulation of the facility. However, no one at the facility wants this responsibility.

This MacDermid facility will be in compliance with TSD and generator requirements once all of the violations listed in Section VI are corrected and confirmed by a follow-up inspection. From this inspection it was found that MacDermid was just a generator of hazardous waste. The facility currently does

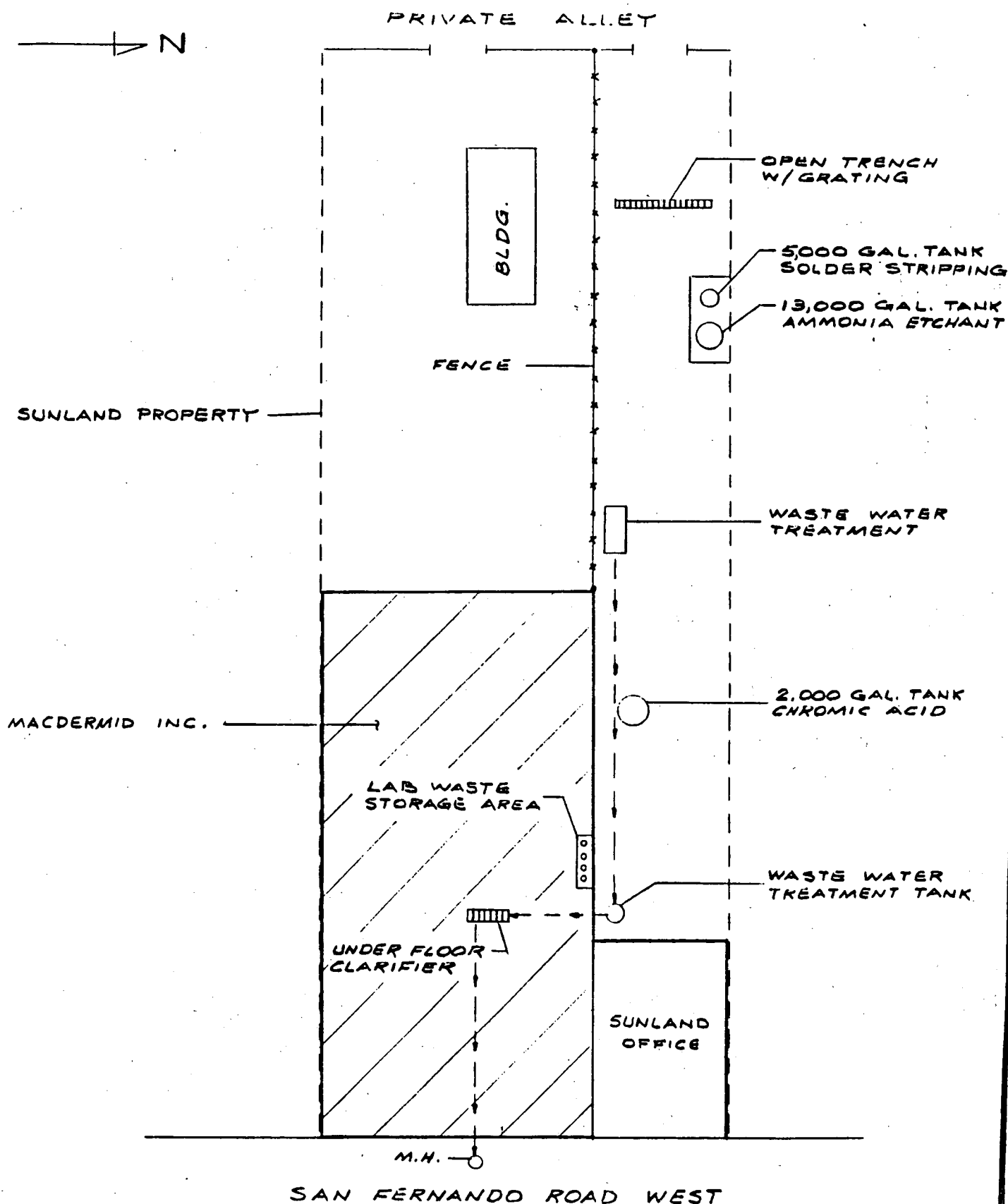
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not treat hazardous waste on-site, store hazardous waste for greater than 90 days, store hazardous waste from off-site, and dispose of hazardous waste on-site. These four factors are the basis for MacDermid submitting a closure plan to the DHS in order to have its status changed from a TSD and generator to a generator only.

IX. Attachments

1. Map of Facility
2. TSD Checklist
3. CMELs
4. Generator Checklist
5. Compliance Report
6. Photo Location Map
7. Photographs
8. Compliance Schedule from 1986 Inspection

TO WRECKING YARD

**McKesson**

McKesson Environmental Services

MACDERMID INCORPORATED  
5439 SAN FERNANDO RD. WEST  
LOS ANGELES, CALIF. 90039

DRAWN BY: GS  
CH'K'D BY:

NOV. 26, 1986

Fig. 2.0

SCALE: NONE